

RADICE LAW FIRM, PC

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Attorneys for Plaintiff

[Additional Counsel Appear on Signature Page.]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TAYLOR GOINES, Individually and on
Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

CELSIUS NETWORK, LLC, CELSIUS
LENDING, LLC, CELSIUS KEYFI LLC,
ALEXANDER MASHINSKY, SHLOMI
“DANIEL” LEON, DAVID BARSE, and
ALAN JEFFREY CARR,

Defendants.

Case No. 2:22-cv-04560

**APPLICATION AND CERTIFICATION
OF JOHN RADICE IN SUPPORT OF
MOTION TO ALLOW SEAN T.
MASSON TO APPEAR AND
PARTICIPATE *PRO HAC VICE***

John Radice, of full age, certifies as follows:

1. I am an attorney at law duly admitted to practice law in the State of New Jersey and in the United States District Court for the District of New Jersey. I am also a member in good standing of the bar of this Court and in all of the bars in which I am a member. I have never been subjected to discipline by any court or governing body.

2. I am the managing partner of the Radice Law Firm, PC, representing Plaintiff Taylor Goines in the above-captioned action. (“Plaintiff”).

3. I make this Certification on my personal knowledge, and I submit this Certification in support of Plaintiff’s motion for an Order pursuant to Rule 101.1(c) permitting Sean T. Masson to appear and participate *pro hac vice* in this action pursuant to the Local Civil Rules of the District of New Jersey.

4. Sean T. Masson (“Mr. Masson”) is an attorney with the law firm of Scott+Scott Attorneys at Law LLP. He is a member in good standing of the Bar of the State of New York. Attached hereto and incorporated herein as Exhibit A, is a Certificate of Good Standing issued by the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department certifying that Mr. Masson is a member of the Bar of the State of New York and is in good standing therein. He is not under suspension, nor has he ever been suspended or disbarred from any Court. No disciplinary proceedings are pending against Mr. Masson, and no discipline has previously been imposed against Mr. Masson in any jurisdiction. Mr. Masson is fully familiar with the facts of this case.

5. Mr. Masson has extensive experience in the prosecution of complex cases involving securities class action, derivative, and transactional litigation.

6. I am confident that Mr. Masson is fully conversant with the Local Civil Rules of the District of New Jersey, and he has advised me that he will abide by those Rules. I have agreed to work with Mr. Masson in the prosecution of this action.

7. If the Court grants the *pro hac vice* admission of Mr. Masson, I will continue to serve as local counsel of record in this matter. Either I or another counsel of record for Plaintiff who is admitted in this District will review and sign pleadings, briefs, and other papers filed with the Court on behalf of Plaintiff, will accept service of papers filed with the Court, and will appear at scheduled Court proceedings. I will be responsible for the conduct of Mr. Masson as counsel in this matter, and I will otherwise comply with all of the terms and conditions of Local Civil Rule 101.1(c).

8. If the Court grants the *pro hac vice* admission of Mr. Masson, I shall ensure that Mr. Masson as *pro hac vice* counsel shall comply with Local Civil Rule 101.1(c)

9. Payment as required by Local Civil Rule 101.1(c)(3) and New Jersey Court Rule 1:28-2(a) will be forwarded to the Clerk of this District and the New Jersey Lawyer's Fund for Client Protection on behalf of Mr. Masson upon his admittance *pro hac vice*, as appropriate.

10. Based on the foregoing, I respectfully request that this Court grant Plaintiff's motion to have Mr. Masson admitted *pro hac vice* for all purposes in this matter, including the trial of this case.

I hereby certify that the foregoing statements by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: August 22, 2022

RADICE LAW FIRM, PC

/s/ John Radice

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Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 22, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: August 22, 2022

/s/ John Radice

John Radice